

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

Emission Guidelines and Compliance Times for Municipal Solid Waste Landfills (40 CFR Part 60, Subpart Cf) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

Emission Guidelines and Compliance Times for Municipal Solid Waste Landfills (40 CFR Part 60, Subpart Cf) (Renewal), EPA ICR Number 2522.03, OMB Control Number 2060-0720.

1(b) Short Characterization/Abstract

The Emission Guidelines and Compliance Times for Emission Guidelines and Compliance Times for Municipal Solid Waste Landfills (40 CFR Part 60, Subpart Cc) (Renewal) were initially proposed on May 30, 1991 and promulgated on March 12, 1996. The Emission Guidelines were updated and published at 40 CFR Part 60, Subpart Cf, in a final rule promulgated on August 29, 2016, and amended on both August 26, 2019 and March 26, 2020 (85 FR 17259).¹ The emission guidelines in the new Subpart Cf apply to existing municipal solid waste (MSW) landfills that have accepted waste since November 8, 1987, and commenced construction, reconstruction, or modification either on or before July 17, 2014. The burden associated with 40 CFR Part 60, Subpart Cf replaces the ICR burden estimates for both 40 CFR Part 60, Subpart Cc (ICR Number 1893.06) and 40 CFR Part 60, Subpart WWW (ICR Number 1557.09). MSW landfills that were constructed after July 17, 2014 or that were modified (had changes in design capacities) after July 17, 2014 are subject to the NSPS for Municipal Solid Waste Landfills (40 CFR Part 60, Subpart XXX, ICR Number 2498.04). All MSW landfills that are subject to the original NSPS (40 CFR Part 60, Subpart WWW), the federal plan (40 CFR Part 62 Subpart GGG), or a state plan implementing the original emission guidelines (40 CFR Part 60, Subpart Cc) would continue to comply with their current requirements unless and until they are covered by a more stringent state or federal plan implementing the emission guidelines in this new Subpart Cf.

Subpart Cf reduces the NMOC emission rate threshold from the previous level of 50 megagrams per year (Mg/yr) to 34 Mg/yr for landfills that are not closed as of August 29, 2016. The final rule retains the design capacity cutoff of 2.5 million Mg and 2.5 million cubic meters in the current emission guidelines. Closed landfills retain the same NMOC threshold of 50 Mg/yr as was the case under Subpart WWW. Closed landfills are also exempted from the one time reporting requirements, provided the landfill fulfilled these requirements under the NSPS (40 CFR Part 60, Subpart WWW), the federal plan (40 CFR Part 62, Subpart GGG), or a state plan implementing 40 CFR Part 60 Subpart Cc. This information is being collected to assure compliance with 40 CFR Part 60, Subpart Cf.

¹ The NESHAP AAAA rulemaking revised EG Subpart Cf to allow affected sources to demonstrate compliance with landfill gas control, operating, monitoring, recordkeeping, and reporting requirements by following the corresponding requirements in the MSW Landfills NESHAP. These final amendments harmonize the control requirements across all of the landfill rules and will result in improved compliance and implementation of the rule.

In general, existing MSW landfills are required to submit initial notifications and reports, maintain records, and conduct initial performance tests and periodic monitoring. Landfill owners/operators must submit initial design capacity reports, initial performance test reports, emission rate reports, and collection and control system design plans. Landfill closure and equipment removal reports are required when the landfill closes or the landfill meets the criteria for removing controls. Annual compliance reports must include the following information: descriptions of any period in which the value of any of the monitored operating parameters fell outside the established ranges, and any period when the collection system or air pollution control equipment is not operating, or when the collected gas was diverted from the control device. The final rule is also requiring an annual wet landfill report for any landfill that recirculated leachate or added other liquids in the last 10 years. Landfills in the closed landfill subcategory are exempt from the wet landfill report. In addition, landfills with exceedances of wellhead operational standards may have additional reporting and recordkeeping burden, including a root cause analysis, corrective action analysis, and implementation timeline.

Landfill owners or operators must keep continuous monitoring records of the parameters reported in the initial performance report; records of monthly monitoring of wellhead temperature, pressure, and nitrogen or oxygen concentration; and records of quarterly monitoring of surface methane concentrations. Landfill owners or operators must also maintain records of all reports, plot maps, and well locations. In addition, owners or operators are required to maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility, or any period during which the monitoring system is inoperative. The recordkeeping and reporting requirements specific to municipal solid waste landfills are detailed in Section 4(b) of this supporting statement. The notifications, reports, and records are essential in determining compliance, and are required of all MSW landfills subject to the emission guidelines. Any owner or operator subject to the provisions of finalized Subpart Cf will maintain a file of these measurements, and retain the file for at least five years following the date of such measurements, maintenance reports, and records.

The landfills emission guidelines under Subpart Cf are implemented through either state plans or a federal plan that EPA will develop for landfills located in states and Indian country that did not develop either a state or tribal plan. States directly implement and enforce their state plan. EPA implements and enforces the federal plan.

Any owner/operator subject to the provisions of this part shall maintain a file containing these documents, and retain the file for at least five years following the generation date of such maintenance reports and records. All reports are sent to either the state or local authority implementing the state plan. If there is no such delegated authority, the reports are sent directly to the U.S. Environmental Protection Agency (EPA) regional office.

EPA estimates that an average of 1,912 respondents per year will be subject to the regulation in the next three years. These 1,912 municipal solid waste landfills, which are owned and operated by either public and private landfill owners (the "Affected Public"), consist of 1,185 privately-owned facilities which are for-profit businesses and 727 publicly-owned

facilities. We assume that they will all respond to EPA inquiries. The ‘burden’ to the Affected Public may be found in Attachment A in: 1) Table 1A: Annual Respondent Burden and Cost: Privately-Owned Municipal Solid Waste Landfills - Emission Guidelines and Compliance Times for Municipal Solid Waste Landfills (40 CFR Part 60, Subpart Cf) (Renewal); and 2) Table 1B: Annual Respondent Burden and Cost: Publicly-Owned Municipal Solid Waste Landfills - Emission Guidelines and Compliance Times for Municipal Solid Waste Landfills (40 CFR Part 60, Subpart Cf) (Renewal).

This ICR adjusts the number of respondents subject to the requirements of Subparts Cf which are implemented under State plans and a Federal plan. For landfills covered by a State plan, both State and local agencies are the “implementing agency,” and will incur a burden through the review of reports submitted to them in accordance with the State plan. We assume approximately 19 percent of landfills (360 MSW landfills) are subject to State plans, and that 10 State and local agencies will enforce the State plans.² The “burden” to State and local agencies is attributed entirely to work performed by either State and/or local employees, and is provided in Attachment A in Table 1C: Average Annual State/Local Agency Burden and Cost – Emission Guidelines and Compliance Times for Existing Municipal Solid Waste Landfills (40 CFR Part 60, Subpart Cf and Federal Plan) (Renewal).

For landfills covered by a Federal plan, EPA is the implementing agency. The Federal plan is currently pending, but is expected to be finalized at 40 CFR Part 62, Subpart OOO. We assume 81 percent of landfills (approximate 1,552 MSW landfills) will be subject to the Federal Plan once it becomes effective.³ The ‘burden’ to the Federal Government is attributed entirely to work performed by either Federal employees or government contractors or to state or local agencies that have been delegated authority and may be found in Attachment A in Table 2: Average Annual EPA Burden and Cost – Emission Guidelines and Compliance Times for Municipal Solid Waste Landfills (40 CFR Part 60, Subpart Cf) (Renewal).

Based on our consultations with industry representatives, there is an average of affected facility (MSW landfill) at each plant site and each plant site has only one respondent (i.e., the owner/operator of the plant site).

Over the next three years, an average of 1,912 respondents per year will be subject to these standards and no additional respondents per year will become subject to these standards. This total (1,912 respondents) includes an average of 25 respondents per year who will modify their facilities and cease being subject to these same standards over the three-year period of this ICR. This represents an increase in the number of respondents reflected in the final rule, and reflects updates to the respondent inventory to reflect the expected number of landfills

² As of August 18, 2020 EPA data indicates that 8 State and local agencies enforce the State plans and two other state agencies are expected to have their plans effective by 2022. Therefore, 10 State and local agencies will be enforcing State plans. EPA assumes that approximately 19 percent of sources (370) are covered by the State Plans.

³ EPA estimates that 1,912 MSW landfills are subject to the requirements of Subpart Cf which are implemented under state plans and a federal plan. The federal plan is currently pending but expected to be finalized at part 62 Subpart OOO. EPA assumes that 81 percent of sources (1,552) will be subject to the federal plan by 2022 for which EPA is the enforcing agency and that 19 percent of sources (360) are covered by the State Plans.

controlling between years 2022 through 2024 based on projected emissions, as well as the number of landfills subject between years 2022 and 2024, based on waste disposal quantities which increase over time at active landfills, and assuming that in these years landfills will be controlling under the more stringent 34 Mg/yr requirements.

The active (previous) ICR (2522.02) had the following Terms of Clearance (TOC):

“Approval granted for one year due to agency collection of information without separate approval under 5 CFR 1320. Upon resubmission, agency should upload a copy of the final rule in the supplementary documents, add the 60 and 30 day FR citations, include screenshots of each click that a respondent would need to make to submit the information online, and include the OMB control number and the burden statement on the first page of the online collection portal.”

EPA has addressed each item of concern in the TOC by providing the additional supplementary materials in Appendix A of this document, including a copy of the final rule, the 60 and 30 day FR citations, screenshots of each click that a respondent would need to make to submit the information online, and an example of the first page of the online collection portal with link to information on the OMB control number and the burden statement. The EPA has also included copies of the 60- and 30-day FR notices for this ICR.

2. Need for and Use of the Collection

2(a) Need/Authority for the Collection

The EPA is charged under section 111(d)(1) of the Clean Air Act (CAA), as amended, to:

... prescribe regulations which shall establish a procedure similar to that provided by section 110 under which each State shall submit to the Administrator a plan which (A) establishes standards of performance for any existing source for any air pollutant (i) for which air quality criteria have not been issued or which is not included on a list published under section 108(a) . . . but (ii) to which a standard of performance under this section would apply if such existing source were a new source, and (B) provides for the implementation and enforcement of such standards of performance.

Subpart B of 40 CFR part 60 requires State plans to include monitoring, recordkeeping, and reporting provisions consistent with the emission guidelines. In addition, section 114(a)(1) states that:

the Administrator may require any person who owns or operates any emission source, who manufactures emission control equipment or process equipment, who the Administrator believes may have information necessary for the purposes set forth in this subsection, or who is subject to any requirement of this Act (other than a manufacturer subject to the provisions of section 206(c) or 208 with respect to a provision of title II) on a one-time, periodic or continuous basis to -

- (A) establish and maintain such records;
- (B) make such reports;
- (C) install, use, and maintain such monitoring equipment, and use such audit procedures, or methods;
- (D) sample such emissions (in accordance with such procedures or methods, at such locations, at such intervals, during such periods and in such manner as the Administrator shall prescribe);
- (E) keep records on control equipment parameters, production variables or other indirect data when direct monitoring of emissions is impractical;
- (F) submit compliance certifications in accordance with section 114(a)(3); and
- (G) provide such other information, as the Administrator may reasonably require.

In the Administrator's judgment, non-methane organic compound (NMOC) emissions from municipal solid waste landfills either cause or contribute to air pollution that may reasonably be anticipated to endanger public health and/or welfare. Therefore, the Emission Guidelines and Compliance Times were promulgated for this source category at 40 CFR Part 60, Subpart Cf.

2(b) Practical Utility/Users of the Data

The recordkeeping and reporting requirements in these standards ensure compliance with the applicable regulations which were promulgated in accordance with the Clean Air Act. The collected information is also used for targeting inspections and as evidence in legal proceedings.

Performance tests are required in order to determine an affected facility's initial capability to comply with these emission standards. Continuous emission monitors are used to ensure compliance with these same standards at all times. During the performance test a record of the operating parameters under which compliance was achieved may be recorded and used to determine compliance in place of a continuous emission monitor.

The notifications required in these standards are used to inform the Agency or delegated

authority when a source becomes subject to the requirements of the regulations. The reviewing authority may then inspect the source to check if the pollution control devices are properly installed and operated, leaks are being detected and repaired, and that these standards are being met. The performance test may also be observed.

The required annual reports are used to determine periods of excess emissions, identify problems at the facility, verify operation/maintenance procedures, and for compliance determinations.

3. Non-duplication, Consultations, and Other Collection Criteria

The requested recordkeeping and reporting are required under 40 CFR Part 60, Subpart Cf.

3(a) Non-duplication

If the subject standards have not been delegated, the information is sent directly to the appropriate EPA regional office. Otherwise, the information is sent directly to the delegated state or local agency. If a state or local agency has adopted its own similar standards to implement the Federal standards, a copy of the report submitted to the state or local agency can be sent to the Administrator in lieu of the report required by the Federal standards. Therefore, duplication does not exist.

3(b) Public Notice Required Prior to ICR Submission to OMB

An announcement of a public comment period for the renewal of this ICR was published in the *Federal Register* (85 FR 28003) on May 12, 2020. No comments were received on the burden published in the *Federal Register* for this renewal.

3(c) Consultations

The Agency has consulted industry experts and internal data sources to project the number of affected facilities and industry growth over the next three years. The primary source of information is based on the database “*Summary of Updated Landfill Dataset Used in the Cost and Emission Reduction Analysis of Landfills Regulations, 2016*” developed for the 2016 rule. The 2016 database included data from 40 CFR part 98, Subpart HH of the EPA Greenhouse Gas Reporting Program (GHGRP), which was supplemented with a database maintained by EPA’s Landfill Methane Outreach Program (LMOP), as well as information received from EPA Regional Offices and state authorities. The number of respondents has been adjusted in this ICR to reflect the expected number of landfills controlling between years 2022 through 2024, as well as for the number of landfills becoming subject to Subpart Cf between years 2022 and 2024, based on waste disposal quantities which increase over time at active landfills, and assuming that in these years landfills will be controlling under the more stringent 34 Mg/yr requirements. An average of approximately 1,912 respondents will be subject to these standards over the three-year period covered by this ICR. This ICR also adjusts the number of respondents subject to the

requirements of Subparts Cf which are implemented under State plans and a Federal plan. The Federal plan is currently pending, but expected to be finalized at 40 CFR part 62, Subpart OOO. EPA assumes that 19 percent of sources (360) are covered by the State plans. As of August 18, 2020, EPA data indicates that 8 State and local agencies enforce the State plans and two other state agencies are expected to have their plans effective by 2022. The remainder of these landfills will be covered by a Federal plan once it becomes effective.

Industry trade associations and other interested parties were provided an opportunity to comment on the burden associated with these standards as they were being developed and these standards have been reviewed previously to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted both the Solid Waste Association of North America (SWANA), at (800) 467-9262, and the National Waste & Recycling Association (NW&RA), at (202) 244-4700. It is our policy to respond after a thorough review of comments received since the last ICR renewal, as well as for those submitted in response to the first *Federal Register* notice. In this case, no comments were received.

3(d) Effects of Less-Frequent Collection

Less-frequent information collection would decrease the margin of assurance that facilities are continuing to meet these standards. Requirements for information gathering and recordkeeping are useful techniques to ensure that good operation and maintenance practices are applied and emission limitations are met. If the information required by these standards was collected less frequently, the proper operation and maintenance of control equipment and the possibility of detecting violations would be less likely.

3(e) General Guidelines

These reporting or recordkeeping requirements do not violate any of the regulations promulgated by OMB under 5 CFR Part 1320, Section 1320.5.

These standards require the respondents to maintain all records, including reports and notifications, for at least five years. This is consistent with the General Provisions as applied to these standards. The EPA believes that the five-year records retention requirement is consistent with the Part 70 permit program and the five-year statute of limitations on which the permit program is based. The retention of records for five years allows EPA to establish the compliance history of a source, any pattern of non-compliance and to determine the appropriate level of enforcement action. The EPA has found that the most flagrant violators have violations extending beyond five years. In addition, EPA would be prevented from pursuing the violators due to the destruction or nonexistence of essential records.

3(f) Confidentiality

Any information submitted to the Agency for which a claim of confidentiality is made will be safeguarded according to the Agency policies set forth in Title 40, chapter 1, part 2, subpart B - Confidentiality of Business Information (CBI) (see 40 CFR 2; 41 FR 36902,

September 1, 1976; amended by 43 FR 40000, September 8, 1978; 43 FR 42251, September 20, 1978; 44 FR 17674, March 23, 1979).

3(g) Sensitive Questions

The reporting or recordkeeping requirements in these standards do not include sensitive questions.

4. The Respondents and the Information Requested

4(a) Respondents/SIC Codes

The respondents to the recordkeeping and reporting requirements are municipal solid waste landfills. The United States Standard Industrial Classification (SIC) code for the respondents affected by the standard and the corresponding North American Industry Classification System (NAICS) codes are listed in the table below:

Standard (40 CFR Part 60, Subpart XXX)	SIC Codes	NAICS Codes
Solid Waste Landfill	4953	562212
Administration of Air and Water Resource and Solid Waste Management Programs	9511	924110

4(b) Information Requested

(i) Data Items

In this ICR, all the data that are recorded or reported is required by the Emission Guidelines and Compliance Times for Municipal Solid Waste Landfills (40 CFR Part 60, Subpart Cf).

A source must make the following notifications and reports:

Notifications and Reports	
Initial and amended design capacity report	§60.33f(d), §60.38f(a), §60.38f(b)
Initial and annual (or 5-year) non-methane organic compounds (NMOC) emission rate reports (or Tier 4 surface emissions report)	§60.33f(e), §60.38f(c)
Initial collection and control system design plans	§60.38f(d)
Revised collection and control system design plans	§60.38f(e)
Landfill closure report	§60.38f(f)
Equipment removal report	§60.38f(g)

Notifications and Reports	
Annual operations reports	§60.8, §60.38f(h)
Initial performance test report	§60.8, §60.38f(h), §60.38f(i)
Electronic reporting	§60.38f(j)
Corrective action analysis	§60.38f(k)
Implementation timeline	§60.38f(k)
Root cause analysis	§60.38f(k)
Liquids addition (Wet landfill annual report)	§60.38f(l)
Notifications of SEM prior to Tier 4	§60.38f(m)
High temperature report for sources complying with NESHAP provisions	§60.38f(n)

A source must keep the following records:

Recordkeeping	
Maintain records of maximum design capacity, refuse-in-place, year-by-year waste acceptance rate (maintain for 5 years)	§60.39f(a)
Maintain records of control system design and initial performance test/compliance determination (must be kept for life of the control equipment; records of subsequent tests must be maintained for 5 years)	§60.39f(b)
Maintain records of equipment operating parameters specified to be monitored in §60.37f for five years	§60.39f(c)
Maintain records of collection system plot map and well locations for the life of the landfill (for life of the collection system)	§60.39f(d)
Maintain records of collection and control system exceedances and monitoring data for 5 years	§60.39f(e), §60.39f(h)
Maintain records of root cause analysis conducted, corrective action, and implementation timeline	§60.39f(e)
Maintain records of annual recalculation of site-specific density and design capacity	§60.39f(f)
Maintain records of all surface emissions monitoring for 5 years (for landfills opting to use the Tier 4 approach)	§60.39f(g)
Maintain records of any engineering calculations or company records used to estimate quantities of leachate of liquids added	§60.39f(j)

Electronic Reporting

Some of the respondents are using monitoring equipment that automatically records parameter data. Although personnel at the affected facility must still evaluate the data, internal automation has significantly reduced the burden associated with monitoring and recordkeeping at a plant site.

The rule was recently amended to include electronic reporting provisions. The EPA is requiring owners and operators of existing MSW landfills to submit electronic copies of certain required performance test reports, NMOC emission rate reports, annual reports, Tier 4 emission rate reports, and annual reports on wet landfilling practices through EPA's Central Data Exchange (CDX) (http://cdx.epa.gov/epa_home.asp) using the Compliance and Emissions Data Reporting Interface (CEDRI). Electronic copies of records may also be maintained in order to satisfy federal recordkeeping requirements. Since most of the test methods in the landfills NSPS are not supported by the EPA Electronic Reporting Tool (ERT) (<https://www.epa.gov/electronic-reporting-air-emissions/electronic-reporting-tool-ert>), electronic reporting of performance tests may not be required for some landfills initially, but will be required when applicable methods are added to the ERT.

(ii) Respondent Activities

Respondent Activities
Familiarization with the regulatory requirements.
Calibrate and operate surface emission monitoring equipment for quarterly monitoring and portable LFG emission analyzer equipment for monthly wellhead monitoring.
Estimate NMOC emission estimates using Tier 1, Tier 2, Tier 3 or Tier 4 procedures in the regulation.
Perform initial performance test, Reference Method 25, Method 25A or 25C test, and repeat performance test if necessary.
Write the notifications and reports listed above.
Enter information required to be recorded above.
Submit the required reports developing, acquiring, installing, and utilizing technology and systems for collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for processing and maintaining information.
Develop, acquire, install, and utilize technology and systems for disclosing and providing information.
Adjust the existing ways to comply with any previously applicable instructions and requirements.

Respondent Activities
Train personnel to be able to respond to a collection of information.
Transmit, or otherwise disclose the information.

Currently, sources are using monitoring equipment that provides parameter data in an automated way (e.g., continuous parameter monitoring system). Although personnel at the source still need to evaluate the data, this type of monitoring equipment has significantly-reduced the burden associated with monitoring and recordkeeping.

5. The Information Collected: Agency Activities, Collection Methodology, and Information Management

5(a) Agency Activities

The EPA conducts the following activities in connection with the acquisition, analysis, storage, and distribution of the required information:

Agency Activities
Observe initial performance tests, repeat performance tests and quarterly surface emissions monitoring (or Tier 4) if necessary.
Review notifications and reports, including performance test reports, excess emissions reports, root cause and corrective action analysis, implementation timeline, and wet landfill monitoring report required to be submitted by industry.
Audit facility records.
Input, analyze, and maintain data in the Enforcement and Compliance History Online (ECHO) and ICIS.

5(b) Collection Methodology and Management

Following notification of startup, the reviewing authority could inspect the source to determine whether the pollution control devices are properly installed and operated. Performance test reports are used by the Agency to discern a source's initial capability to comply with the emission standards and note the operating conditions under which compliance was achieved. Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs. The annual reports are used for problem identification, as a check on source operation and maintenance, and for compliance determinations.

Information contained in the reports is reported by state and local governments in the ICIS Air database, which is operated and maintained by EPA's Office of Compliance. ICIS is EPA's database for the collection, maintenance, and retrieval of compliance data for industrial

and government-owned facilities. EPA uses ICIS for tracking air pollution compliance and enforcement by local and state regulatory agencies, EPA regional offices and EPA headquarters. EPA and its delegated authorities can edit, store, retrieve and analyze the data. Certain data will also be stored and accessible through the EPA's Central Data Exchange (CDX) (http://cdx.epa.gov/epa_home.asp).

The records required by this regulation must be retained by the owner/operator for five years.

5(c) Small Entity Flexibility

The EPA has determined that approximately 7%, or 82 of the 1,185 privately-owned existing landfills and approximately 4%, or 27 of the 727 publicly-owned existing landfills subject to similar regulations (40 CFR Part 60 Subparts WWW and Cc or the corresponding state or federal plan) are small entities based on the ownership profiles of landfills in its regulatory database developed for the 2016 rule. The percentage of small private and public entities was determined based on the percentages of small entities determined in final rule.

Subpart Cf does not contain any provisions reserved exclusively for the benefit of small entities. However, there are several compliance flexibilities that will benefit all landfills, including small entities. First, the finalized subpart included a separate subcategory for closed landfills. This subcategory retains an emission threshold of 50 Mg/yr, which is currently promulgated in similar regulations. Landfills in this category are also exempt from many of the one-time reporting requirements, provided those reports were submitted under 40 CFR part 60, Subparts WWW and Cc or the corresponding state or federal plan. Landfills in the closed landfill subcategory are also exempt from the annual wet landfill report. Second, while these standards continue to require monthly monitoring of wellhead parameters, the EPA has removed the wellhead operating standards for oxygen/nitrogen, which will reduce the corrective actions, re-monitoring, and requests for alternative timelines. Third, the final rule provided a non-numeric definition of treatment, which is expected to provide some flexibility for landfills with LFG energy recovery. Since treatment is one of the three compliance pathways for controlling LFG, this ICR does not estimate the number of landfills that may opt to use the treatment pathway for compliance. Finally, the final rule has included alternative site-specific emission thresholds for determining when a landfill must install (Tier 4) controls, which is expected to provide flexibility for landfill owners/operators required to control under Subpart Cf. The ICR burden was estimated assuming 50% of landfills use Tier 1 and 50% use Tier 2 as it is unknown how many landfills would opt to use Tier 4.

Subpart Cf does not contain any provisions reserved exclusively for the benefit of small entities. However, the design capacity threshold of 2.5 million megagrams and 2.5 million cubic meters limits the effect of this regulation on smaller landfills, which tend to be disproportionately owned by smaller entities.

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown in Attachment A in both Table 1A: Annual Respondent Burden and Cost: Privately-Owned Municipal Solid Waste Landfills - Emission Guidelines and Compliance Times for Municipal Solid Waste Landfills (40 CFR Part 60, Subpart Cf) (Renewal) and Table 1B: Annual Respondent Burden and Cost: Publicly-Owned Municipal Solid Waste Landfills - Emission Guidelines and Compliance Times for Municipal Solid Waste Landfills (40 CFR Part 60, Subpart Cf) (Renewal).

6. Estimating the Burden and Cost of the Collection

Tables 1A and 1B document the computation of individual burdens for the recordkeeping and reporting requirements applicable to the industry for the subpart included in this ICR. The individual burdens are expressed under standardized headings believed to be consistent with the concept of ‘Burden’ under the Paperwork Reduction Act. Where appropriate, specific tasks and major assumptions have been identified. Responses to this information collection are mandatory.

Table 1C documents the computation of annual burden for State and local agencies that implement and enforce the State plan. State and local agency ‘burden’ is expressed under standardized headings, which are believed to be consistent with the concept of ‘Burden’ under the Paperwork Reduction Act. Where appropriate, specific tasks and major assumptions have been identified in the table. On average, 10 State/local agencies will be enforcing State plans that cover 360 landfills affected by State plans. State and local agencies conduct the same activities as EPA.

In total, the emission guidelines for MSW landfills are estimated to affect an average of 1,912 landfills. Of these, 1,552 are affected by the Federal plan and 360 are affected by State plans.

The Agency may neither conduct nor sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB Control Number.

6(a) Estimating Respondent Burden

The average annual burden to industry over the next three years from these recordkeeping and reporting requirements is estimated to be 634,000 hours (Total Labor Hours from Tables 1A and 1B). The average annual burden to State and local agencies that implement and enforce State plans is 2,100 hours (Total Labor Hours from Table 1C). State and local agencies conduct the same activities as the EPA. These hours are based on Agency studies and background documents from the development of the regulation, Agency knowledge and experience with the Emission Guidelines program, the previously-approved ICR, and any comments received.

6(b) Estimating Respondent Costs

(i) Estimating Labor Costs

This ICR uses the following labor rates for employees at publicly and privately-owned landfills:

Managerial	\$119.85 (\$57.07 + 110%)
Technical – Civil Engineer	\$95.26 (\$45.36 + 110%)
Technical – Civil Engineer Technician	\$56.01 (\$26.67 + 110%)
Clerical	\$36.71 (\$17.48 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, May 2019, “National Occupational Employment and Wage Estimates United States”. The rates are for: Managers, All Other for Managerial Labor; Civil Engineers; Civil Engineer Technicians; and Office Clerks, General for Clerical Labor. The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry. For public-sector respondents (i.e., publicly-owned or -operated landfills), it was assumed that the work performed will be completed by private contractors. Details upon which this estimate is based appear in Attachment A in Table 1A: Annual Respondent Burden and Cost: Privately-Owned Municipal Solid Waste Landfills - Emission Guidelines and Compliance Times for Municipal Solid Waste Landfills (40 CFR Part 60, Subpart Cf) (Renewal) and Table 1B: Annual Respondent Burden and Cost: Publicly-Owned Municipal Solid Waste Landfills - Emission Guidelines and Compliance Times for Municipal Solid Waste Landfills (40 CFR Part 60, Subpart Cf) (Renewal).

For other public-sector respondents (i.e., state or local agencies), EPA applied the same Federal government employee labor rates as EPA agency staff, which are presented in Section 6(c). Details upon which this estimate is based appear in Attachment A in Table 1C: Average Annual State/Local Agency Burden and Cost – Emission Guidelines and Compliance Times for Existing Municipal Solid Waste Landfills (40 CFR Part 60, Subpart Cf and Federal Plan) (Renewal)

(ii) Estimating Capital/Startup and Operation and Maintenance Costs

The types of industry costs associated with the information collection activities in the subject standards are both labor costs, which are addressed elsewhere in this ICR, and the costs associated with continuous monitoring at the flare station, quarterly surface monitoring, monthly wellhead monitoring, and conducting a Tier II NMOC emission rate test. The capital/startup costs are one-time costs when a facility becomes subject to these regulations or when the facility first installs controls. The capital costs from the final rule were annualized over the five-year period allowed before another Tier II test must be conducted. While the final rule allowed landfills to conduct Tier 3 or Tier 4, industry experience suggests that no landfills are using the Tier 3 approach and it is unknown how many landfills would use the Tier 4 alternative. The

capital costs for the initial performance testing and continuous monitoring equipment were annualized over a 15-year period, consistent with the expected lifetime of the flare, and an estimated annual O&M for these equipment were also estimated based on consultation with industry on the Subpart WWW ICR renewal.

For landfills that must install gas collection and control systems, there are additional non-labor costs associated with conducting an initial (and repeat, if necessary) performance test on the flare or other destruction device, conducting quarterly surface emission monitoring (SEM), and conducting monthly wellhead monitoring. However, the final rule cost analysis assumed that the portable equipment used to complete the SEM and wellhead is rented and not purchased. Based on industry experience, many landfills contract out monitoring services. Therefore, no capital/startup costs are estimated. The table below includes rental cost and calibration and hydrogen fuel costs for the annual O&M of SEM equipment. For wellhead monitoring, the most-recent ICR applied the full monitoring cost in terms of burden hours. Therefore, the table below only shows the O&M costs associated with the calibration gases for the wellhead monitoring device. The costs to monitor surface emissions and wellheads are also included in the annualized cost impacts analysis for the final rule.

The annual operation and maintenance costs are the ongoing costs to maintain, calibrate, and operate the purchased monitoring equipment, rent monitoring equipment, and such other costs as photocopying and postage.

(iii) Capital/Startup vs. Operation and Maintenance (O&M) Costs

Capital/Startup vs. Operation and Maintenance (O&M) Costs							
(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
Continuous Monitoring Device	Capital/Startup Cost for One Respondent	Annualized Capital/Startup Cost for One Respondent	Average Number of Respondents per Year	Total Annualized Capital / Startup Cost, (C x D) per Year	Annual O&M Costs for One Respondent	Number of Respondents with O&M	Total O&M (F x G)
Method 25 or 25C testing costs for initial performance test ^a	\$10,067	\$1,105	32	\$35,370	\$0	0	\$0
Sampling probe and Method 25 or 25C testing costs for Tier 2 test ^b	\$11,104	\$2,708	29	\$78,540	\$0	0	\$0
Method 21 Surface Emission Monitor ^c	0	0	0	\$0	\$2,814	652	\$1,834,728
Portable Wellhead Monitor ^d	0	0	0	\$0	\$204	652	\$133,008

Flow Meter ^{e, f}	\$3,000	\$329	32	\$10,540	\$1,000	652	\$652,000
Thermocouple ^{e, f}	\$500	\$55	32	\$1,757			
Data Recorder ^{e, f}	\$4,500	\$494	32	\$15,811			
Totals (Rounded)				\$142,000			\$2,620,000
Total (Rounded)							\$2,760,000

^a This requirement applies to existing landfills requiring controls. Annualized cost is figured for method 25 or 25C test at 7% over 15 years, which is the expected lifetime of the flare or other destruction device. This requirement applies only to landfills that are not "legacy" controllers (i.e. those controlling under the revised more stringent 34 Mg/yr requirement, not those already subject to controls under the original 50 Mg/yr requirement).

^b Tier 2 testing is done by operating landfills that do not meet control thresholds but meet the size thresholds of 2.5 million Mg. Of these 58 landfills, 50% assumed to do Tier 1 testing and 50% assumed to do Tier 2 testing. Since a Tier 2 test must be repeated every 5 years, annualized capital cost is based on the cost for conducting a method 25, method 25A or 25C test, figured at 7% over 5 years.

^c All controlled landfills must conduct quarterly surface emissions testing at all penetrations of the cover. We assume weekly equipment rental costs at \$600/week, and one week per occurrence. In addition, the landfill will need to purchase calibration gases and hydrogen fuel (at a cost of \$103.50 per event) to operate the surface monitoring equipment.

^d All controlled landfills must conduct monthly wellhead monitoring.

^e Sources required to install a control system purchase and install this equipment prior to their initial performance test. Since landfills that have already started controlling emissions would have already made these equipment capital expense purchases, this cost only applies to landfills that are newly becoming controllers for the first time.. Annualized cost is figured at 7% over 15 years.

^f All sources operating controls maintain the flow meter, thermocouple, and data recorder annually at a cost of \$1,000.

The total capital/startup costs for this ICR are \$142,000. This is the total of column E in the above table.

The total operation and maintenance (O&M) costs for this ICR are \$2,620,000. This is the total of column H.

The average annual cost for capital/startup and operation and maintenance costs to industry over the next three years of the ICR is estimated to be \$2,760,000. These are the recordkeeping costs.

6(c) Estimating Agency Burden and Cost

The only costs to the Agency are those costs associated with analysis of the reported information. The EPA's overall compliance and enforcement program includes such activities as the examination of records maintained by the respondents, periodic inspection of sources of emissions, and the publication and distribution of collected information. The average annual Agency cost during the three years of the ICR is estimated to be \$558,000. This cost is based on the average hourly labor rate as follows:

Managerial	\$68.37 (GS-13, Step 5, \$42.73 + 60%)
Technical	\$50.72 (GS-12, Step 1, \$31.70 + 60%)
Clerical	\$27.46 (GS-6, Step 3, \$17.16 + 60%)

These rates are from the Office of Personnel Management (OPM), 2020 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to Federal government employees. Details upon which this estimate is based appear in Attachment A in Table 2: Average Annual EPA Burden and Cost – Emission Guidelines and Compliance Times for Municipal Solid Waste Landfills (40 CFR Part 60, Subpart Cf) (Renewal)

6(d) Estimating the Respondent Universe and Total Burden and Costs

Based on our research for this ICR, on average over the next three years, approximately 1,912 existing respondents will be subject to these standards. This total (1,912 respondents) includes an average of 25 landfills per year that will modify and cease being subject to these standards over the three-year period of this ICR. The overall average number of respondents, as shown in the table below, is 1,912 per year.

The number of respondents is calculated using the following table that addresses the three years covered by this ICR:

Number of Respondents					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
	(A)	(B)	(C)	(D)	(E)
Year	Number of New Respondents ^a	Number of Existing Respondents ^b	Number of Existing Respondents that keep records but do not submit reports	Number of Existing Respondents That Are Also New Respondents	Number of Respondents (E=A+B+C-D)
1	0	1,937	0	0	1,937
2	0	1,912	0	0	1,912
3	0	1,887	0	0	1,887
Average	0	1,912	0	0	1,912

^a There are no new respondents. Once a source constructs or modifies, they become subject to NSPS Subpart XXX.

^b We assume that 25 sources per year will modify and become subject to Subpart XXX. The previous ICR (2522.02) estimated respondents based on data collected during the 2016 final rule. Due to the gap year between the expiration of the previous ICR and Year 1 of this ICR, the 'Number of Existing Respondents' from the previous ICR has been adjusted to reflect the expected number of landfills controlling between years 2022 through 2024 based on projected emissions, as waste disposal quantities increase over time at active landfills, and assuming that in these years landfills will be controlling under the more stringent 34 Mg/yr requirements.

Column D is subtracted to avoid double-counting respondents. As shown above, the

average Number of Respondents over the three-year period of this ICR is 1,912.

The total number of annual responses per year⁴ is calculated using the following table:

Total Annual Number of Responses				
(A) Information Collection Activity	(B) Number of Respondents	(C) Number of Responses per Respondent	(D) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(E) Total Responses E=BxC+D
Privately-Owned Landfills				
Initial performance test report ^a	18	1	NA	18
Initial design capacity report ^b	15	1	NA	15
Amended design capacity report	13	1	NA	13
Report of NMOC rate (Tier 1)	8	1	NA	8
Report of NMOC rate (Tier 2)	8	1	NA	8
Landfill Closure Report	10	1	NA	10
Equipment Removal Report	0	1	NA	0
Collection and Control System Design Plan	18	1	NA	18
Revised C&C System design plan	1.8	1	NA	1.8
Annual Report	365	1	NA	365
Corrective Action Analysis	1	1	NA	1
Implementation Timeline	1	1	NA	1
Root Cause Analysis	1	1	NA	1
Wet Landfill Monitoring Report	175	1	NA	175
Total Responses for Privately-Owned Landfills (rounded)				635
Publicly-Owned Landfills				
Initial performance test report ^a	14	1	NA	14
Initial design capacity report ^b	40	1	NA	40
Amended design capacity report	12	1	NA	12
Report of NMOC rate (Tier 1)	21	1	NA	21
Report of NMOC rate (Tier 2)	21	1	NA	21
Landfill Closure Report	19	1	NA	19
Equipment Removal Report	0	1	NA	0
Collection and Control System Design Plan	14	1	NA	14
Revised C&C System design plan	1.4	1	NA	1.4

⁴ Detailed assumptions upon which the estimates for the number of responses for private, public, and State/Local agencies are based appear in Attachment A in Table 1A: Annual Respondent Burden and Cost: Privately-Owned Municipal Solid Waste Landfills - Emission Guidelines and Compliance Times for Municipal Solid Waste Landfills (40 CFR Part 60, Subpart Cf) (Renewal), Table 1B: Annual Respondent Burden and Cost: Publicly-Owned Municipal Solid Waste Landfills - Emission Guidelines and Compliance Times for Municipal Solid Waste Landfills (40 CFR Part 60, Subpart Cf) (Renewal), and Table 1C: Average Annual State/Local Agency Burden and Cost – Emission Guidelines and Compliance Times for Existing Municipal Solid Waste Landfills (40 CFR Part 60, Subpart Cf and Federal Plan) (Renewal)

Annual Report	287	1	NA	287
Corrective Action Analysis	1	1	NA	1
Implementation Timeline	1	1	NA	1
Root Cause Analysis	1	1	NA	1
Wet Landfill Monitoring Report	82	1	NA	82
Total Responses for Publicly-Owned Landfills (rounded)				514
State/Local Agencies				
Review initial design capacity report ^c	10	1	NA	10
Review amended design capacity report	5	1	NA	5
Review annual NMOC emission rate reports (Tier 1 and Tier 2)	11	1	NA	11
Review landfill closure report	6	1	NA	6
Review equipment removal report	0	1	NA	0
Review Collection and Control System Design Plan	6	1	NA	6
Review Revised Collection and Control System Design Plan	0.6	1	NA	0.6
Review Initial Performance Test report	6	1	NA	6
Review Annual Report	124	1	NA	124
Review Corrective Action Analysis	1	1	NA	1
Review Implementation Timeline	1	1	NA	1
Review Root Cause Analysis	1	1	NA	1
Review Wet Landfills Monitoring Report	51	1	NA	51
Total Responses for State/Local Agencies (rounded)				223
Total Responses (rounded)				1,372

^a We estimate that, over the three-year period of this ICR, an average of 32 respondents per year (18 privately-owned and 14 publicly-owned) will need to install controls, perform the initial performance test, and submit an initial performance test report. We assume that each respondent will take 12 hours to attend the test, review the report (written by the testing company), and submit the report.

^b Based on the regulatory database, there are 164 landfills with design capacity less than 2.5 million megagrams by mass or 2.5 million cubic meters by volume and thus will complete the initial design capacity report in the first year of this ICR. This averages to 55 landfills annually over the three-year period of this ICR. This is a one-time requirement. Based on the regulatory database, 73% (40) of these respondents are public and 27% (15) are private.

^c The initial design capacity reports under Subpart Cf are only needed if the landfill is not a legacy controller that had previously submitted a report. Over the three-year period of this ICR, we expect an average of 55 landfills per year to file this report. Of this 55, approximately 19% or 10 landfills are in states that enforce state plans.

The number of Total Annual Responses is 1,372.

The total annual labor costs to both private and public respondents are \$42,800,000.00 (rounded). Details regarding these estimates may be found in Attachment A in Table 1A: Annual Respondent Burden and Cost: Privately-Owned Municipal Solid Waste Landfills - Emission Guidelines and Compliance Times for Municipal Solid Waste Landfills (40 CFR Part 60, Subpart Cf) (Renewal) and Table 1B: Annual Respondent Burden and Cost: Publicly-Owned Municipal Solid Waste Landfills - Emission Guidelines and Compliance Times for Municipal Solid Waste Landfills (40 CFR Part 60, Subpart Cf) (Renewal).

The total annual labor costs to State and local agencies is \$135,000. Details regarding

these estimates may be found in Attachment A in Table 1C: Average Annual State/Local Agency Burden and Cost – Emission Guidelines and Compliance Times for Existing Municipal Solid Waste Landfills (40 CFR Part 60, Subpart Cf and Federal Plan) (Renewal).

6(e) Bottom Line Burden Hours and Cost Tables

The detailed bottom line burden hours and cost calculations for the respondents and the Agency are shown in Tables 1A, 1B, 1C and 2 in Attachment A, respectively, and summarized below.

(i) Respondent Tally

The total annual labor hours are 634,000 hours (rounded). Details regarding these estimates may be found in Attachment A in Table 1A: Annual Respondent Burden and Cost: Privately-Owned Municipal Solid Waste Landfills - Emission Guidelines and Compliance Times for Municipal Solid Waste Landfills (40 CFR Part 60, Subpart Cf) (Renewal) and Table 1B: Annual Respondent Burden and Cost: Publicly-Owned Municipal Solid Waste Landfills - Emission Guidelines and Compliance Times for Municipal Solid Waste Landfills (40 CFR Part 60, Subpart Cf) (Renewal).

The total annual labor hours for State/local agencies is 2,100. Details regarding these estimates may be found in Attachment A in Table 1C: Average Annual State/Local Agency Burden and Cost – Emission Guidelines and Compliance Times for Existing Municipal Solid Waste Landfills (40 CFR Part 60, Subpart Cf and Federal Plan) (Renewal).

We assume that burdens for managerial tasks take 5% of the time required for technical tasks because the typical tasks for managers are to review and approve reports. Clerical burdens are assumed to take 10% of the time required for technical tasks because the typical duties of clerical staff are to proofread the reports, make copies and maintain records.

Furthermore, the annual private and public reporting and recordkeeping burden(s) for this collection of information is estimated to average 551 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$2,760,000. The cost calculations are detailed in Section 6(b)(iii), Capital/Startup vs. Operation and Maintenance (O&M) Costs.

(ii) The Agency Tally

The average annual Agency burden and cost over next three years is estimated to be 8,800 labor hours at a cost of \$558,000; see below in Attachment A, Table 2: Average Annual EPA Burden and Cost – Emission Guidelines and Compliance Times for Municipal Solid Waste Landfills (40 CFR Part 60, Subpart Cf) (Renewal).

We assume that burdens for managerial tasks take 5% of the time required for technical

tasks because the typical tasks for managers are to review and approve reports. Clerical burdens are assumed to take 10% of the time required for technical tasks because the typical duties of clerical staff are to proofread the reports, make copies and maintain records.

6(f) Reasons for Change in Burden

There is an adjustment decrease in the total estimated burden as currently identified in the OMB Inventory of Approved Burdens. This ICR reflects the average annual respondents and burden for the rule activities following implementation of the 2016 Subpart Cf rule. The decrease in burden is due to changes in several areas. The previous ICR (2522.02) estimated respondents based on data collected during the 2016 final rule. The number of respondents has been adjusted in this ICR based on the regulatory database used for the 2016 rule. The number of respondents reflects the lower expected number of landfills controlling between years 2022 through 2024 based on projected emissions, as well as the number of landfills subject between years 2022 and 2024, based on waste disposal quantities which increase over time at active landfills. The number of respondents also assumes that, in these years, landfills will be controlling under the more stringent 34 Mg/yr requirements. The estimates also subtract out landfills expected to modify during this time period and become subject to the MSW landfill 2016 NSPS Subpart XXX instead (ICR No. 2498, OMB Control Number 2060-0697). This ICR therefore reflects an increase in the total number of respondents subject to the rule, but a smaller number of controlling landfills subject to monitoring and testing requirements.

However, this ICR also reflects that some landfills subject to EPA approved state plans implementing Subpart Cf have completed their initial implementation activities to comply with the rule. Therefore, capital/startup costs (new equipment and testing) have decreased. O&M costs have also decreased from the previous ICR due to a decrease in the number of landfills required to control emissions and perform monitoring. The labor burden has decreased in this ICR. Most landfills have completed their initial compliance requirements, such as testing, submitting design capacity reports, submitting collection and control system design plans. Additionally, this ICR adjusts the burden to remove requirements for certain sources (e.g., legacy controllers) that would have submitted certain one-time reports under other MSW Landfill regulations, and are not required to resubmit reports under Subpart Cf (e.g., the initial design capacity reports under Subpart Cf are only needed if the landfill is not a legacy controller that had previously submitted a report). This ICR also adjusts the burden for landfills to familiarize themselves with the new rule requirements to reflect the initial burden for reviewing the Federal plan or State plans, as they are implemented, and a lower recurring burden for re-familiarizing with the rule requirements after the first year.

This ICR also adjusts the number of respondents subject to the requirements of Subpart Cf which are implemented under State plans and a Federal plan to incorporate the burden associated with the Federal plan. The Federal plan is currently pending but expected to be finalized at 40 CFR Part 62, Subpart OOO. As of August 18, 2020, EPA data indicates that 8 State and local agencies enforce the State plans and two other state agencies are expected to have their plans effective by 2022. The remainder of these landfills will be covered by a federal plan once it becomes effective. The burden on State and local agencies is included in respondent

burden in this ICR. Although the rule has been amended since the previous ICR, these changes did not result in an increase in burden.

6(g) Burden Statement

The annual private and public reporting and recordkeeping burden for this collection of information is estimated to average 551 hours per response. ‘Burden’ means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information either to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information.

An agency may neither conduct nor sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB Control Number. The OMB Control Numbers for EPA regulations are listed at 40 CFR Part 9 and 48 CFR Chapter 15.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-OECA-2020-0204. An electronic version of the public docket is available at <http://www.regulations.gov/>, which may be used to obtain a copy of the draft collection of information, submit or view public comments, access the index listing of the contents of the docket, and to access those documents in the public docket that are available electronically. When in the system, select “search,” then key in the docket ID number identified in this document. The documents are also available for public viewing at the Enforcement and Compliance Docket and Information Center in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Ave., NW, Washington, DC. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the docket center is (202) 566-1752. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, DC 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OECA-2020-0204 and OMB Control Number 2060-0720 in any correspondence.

Part B of the Supporting Statement

This part is not applicable because no statistical methods were used in collecting this information.

ATTACHMENT A

Table 1A: Annual Respondent Burden and Cost: Privately-Owned Municipal Solid Waste Landfills - Emission Guidelines and Compliance Times for Municipal Solid Waste Landfills (40 CFR Part 60, Subpart Cf) (Renewal)

Table 1B: Annual Respondent Burden and Cost: Publicly-Owned Municipal Solid Waste Landfills - Emission Guidelines and Compliance Times for Municipal Solid Waste Landfills (40 CFR Part 60, Subpart Cf) (Renewal)

Table 1C: Average Annual State/Local Agency Burden and Cost – Emission Guidelines and Compliance Times for Existing Municipal Solid Waste Landfills (40 CFR Part 60, Subpart Cf and Federal Plan) (Renewal).

Table 2: Average Annual EPA Burden and Cost – Emission Guidelines and Compliance Times for Municipal Solid Waste Landfills (40 CFR Part 60, Subpart Cf) (Renewal)